FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

The New York Blower Company
171 Factory Street
La Porte, Indiana 46350

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 091-13638-00056	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal and fiberglass air moving equipment manufacturing source.

Authorized Individual:	Byron L. Taylor
Source Address:	171 Factory Street, La Porte, Indiana 46350
Mailing Address:	171 Factory Street, La Porte, Indiana 46350
SIC Code:	3564
Source Location Status:	La Porte County
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This metal and fiberglass air moving equipment manufacturing source consists of four (4) plants located on contiguous properties, having the same SIC codes, owned by one (1) company, and functioning as a single source. Therefore, they are considered one (1) source.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Six (6) paint booths, identified as S1, S2, S3, S4, S7 and S8, constructed between 1974 and 1979, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stacks S1, S2, S3, S4, S7 and S8, respectively.

(b) Two (2) paint booths, identified as S5 and S6, constructed between 1974 and 1979, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.

(c) One (1) paint booth, identified as S9, constructed after 1979, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stack S9, respectively.

(d) One (1) fiberglass spray booth, identified as S11, constructed between 1974 and 1979, equipped with flow coaters and dry filters as overspray control, exhausting to stack S11.

(e) One (1) fiberglass booth for hand cleaning molds with acetone, gel coat repair application using cup guns, and graphite application, identified as S12, constructed between 1974 and 1979, equipped with dry filters as overspray control, exhausting to stack S12.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Plant 1 - Three (3) 4.95 million British thermal unit per hour Rapid Air units, one (1) 0.4 million British thermal unit per hour Reznor MUA, two (2) 0.32 million British thermal unit per hour phosphate pressure wash units and two (2) 1.0 million British thermal unit loading dock heaters (all units natural gas fired).

(b) Plant 2 - Five (5) 0.084 million British thermal unit per hour heaters, one (1) 0.28 million British thermal unit per hour heater, two (2) 0.104 million British thermal unit per hour heaters, one (1) 0.2 million British thermal unit per hour air makeup unit, one (1) 0.3465 million British thermal unit per hour air makeup unit, one (1) 0.2475 million British thermal unit per hour air makeup unit, one (1) 0.495 million British thermal unit per hour air makeup unit, one (1) 0.66 million British thermal unit per hour air makeup unit, one (1) 2.2 million British thermal unit per hour air makeup unit and one (1) 1.0 million British thermal units per hour heater (all units natural gas fired).

(c) Plant 3 - One (1) 6.25 million British thermal unit per hour air makeup unit, one (1) 3.03 million British thermal unit per hour Rapid Air unit and one (1) 0.32 million British thermal unit per hour phosphate pressure wash unit (all units natural gas fired).

(d) Plant 4 - One (1) 5.5 million British thermal unit per hour air makeup unit, one (1) 3.3 million British thermal unit per hour air makeup unit, one (1) phosphate wash unit consisting of two (2) 2.5 million British thermal unit per hour burners, two (2) 2.4 million British thermal unit per hour dry off ovens, one (1) 0.32 million British thermal unit per hour phosphate pressure washer, and one (1) 2.4 million British thermal unit per hour curing oven system (all units natural gas fired).

(e) Welding units, capacity: 0.018 tons of electrode per hour.

(f) One (1) electrostatic closed loop powder spray booth, capacity: 15.3 pounds of powder coat per hour.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP) Renewal.

A.6 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM,

OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contem-

poraneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was, at the time being, properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Regional Office Telephone No.: 1-888-209-8892 or 1-219-881-6712
Regional Office Facsimile No.: 1-219-881-6745

Failure to notify IDEM, OAQ and Northwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68,

including the registration and submission of a Risk Management Plan (RMP)

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ending on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Six (6) paint booths, identified as S1, S2, S3, S4, S7 and S8, constructed between 1974 and 1979, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stacks S1, S2, S3, S4, S7 and S8, respectively.

(b) Two (2) paint booths, identified as S5 and S6, constructed between 1974 and 1979, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.

(c) One (1) paint booth, identified as S9, constructed after 1979, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stack S9, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to metal products at the one (1) paint booth, identified as S9, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for air dried and forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) Operation Condition 9 from CP 091-2410-00056, issued on October 15, 1992, and Condition D.1.1(c) from FESOP 091-5578-00056, issued on December 12, 1996, which state that Booth S10 shall use High Volume, Low Pressure (HVLP) paint guns as an alternative to the requirements of 326 IAC 8-2-9, is not applicable because the one (1) paint booth, Booth S10, and stack S10 have been removed.

D.1.2 FESOP Minor Limits [326 IAC 2-8]

(a) The amount of VOC delivered to the applicators at the nine (9) paint booths, plus VOC usage for clean up, minus the VOC recovered, shall not exceed seventy (70) tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

(b) Condition D.1.1(d) from FESOP 091-5578-00056, issued on December 12, 1996, which stated that the amount of volatile organic compounds (VOCs) delivered to the paint applicators plus used for clean up shall not exceed 80 tons per 12 month period, is not incorporated into this permit because the Permittee has requested that the potential to emit VOC from the nine (9) paint booths be limited to less than 70 tons per consecutive twelve (12) month period.

(c) The amount of any single hazardous air pollutant (HAP) delivered to the paint applicators, plus the amount of that same HAP used for clean up, plus the amount of that same HAP used by all other facilities at this source shall not exceed 9.0 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

(d) The amount of any combination of HAPs delivered to the paint applicators plus the amount of any combination of HAPs used for clean up shall not exceed 13 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the nine (9) paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 VOC and HAP Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound (VOC) and hazardous air pollutant (HAP) usage for the twelve (12) month period.

D.1.7 Particulate Matter (PM)

Pursuant to FESOP 091-5578-00056, issued on December 12, 1996, and in order to comply with D.1.3, the dry filters for PM control shall be in operation at all times when the nine (9) paint booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

(a) Daily inspections and manometer readings shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S1 through S9, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Redundant secondary filter systems shall be installed behind each primary filter system and, at each booth, a manometer reading of the secondary redundant filter system shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.

(c) Inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground each time a maintenance employee goes onto a building rooftop, and no less than once per quarter. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(e) Condition D.1.4 of FESOP 091-5578-00056, issued on December 12, 1996, which stated that weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground and for times when the Permittee has determined it unsafe to inspect the rooftop, it is acceptable to inspect the plenum behind the dry filters to determine if overspray has occurred, is not applicable because rooftop inspections are unsafe at this source. The Permittee has requested to perform rooftop inspections each time a maintenance employee goes onto a building rooftop and no less than once per quarter. In order to ensure no overspray, The New York Blower has installed redundant secondary filter systems behind each primary filter system. Manometer readings will be performed daily on the primary filter systems and on the secondary filter systems each time there is a filter change at the primary filter system. These requirements are specified in (a) through (d) of this condition.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and quarterly inspections, daily manometer readings, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) Operation Condition 5 from CP 091-2410-00056, issued on October 15, 1992, which states that a quarterly summary to show compliance of Booth S9 with 326 IAC 8-2-9 through shall be submitted to IDEM, is not applicable because the Permittee has indicated that only nyb green, Carrier Gray and Hi-Heat Gray are used in Booth 9. Those three (3) coatings have VOC contents less than 3.5 pounds per gallon. Therefore, the source will still be required to keep records and Material Safety Data Sheets (MSDSs) to show compliance, but quarterly reporting will not be required as long as only coating with VOC contents less than 3.5 pounds per gallon are used.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(d) One (1) fiberglass spray booth, identified as S11, constructed between 1974 and 1979, equipped with flow coaters and dry filters as overspray control, exhausting to stack S11.

(e) One (1) fiberglass booth for hand cleaning molds with acetone, gel coat repair application using cup guns, and graphite application, identified as S12, constructed between 1974 and 1979, equipped with dry filters as overspray control, exhausting to stack S12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 FESOP Minor Limits [326 IAC 2-8]

(a) The total VOC usage at the two (2) fiberglass booths, identified as S11 and S12, shall be limited such that the total VOC emissions shall be less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

(b) Condition D.3.1 from FESOP 091-5578-00056, issued on December 12, 1996, which states that the amount of volatile organic compounds (VOCs) delivered to the fiberglass applicators plus used for clean up shall not exceed 10 tons per 12 month period, is not applicable because the Permittee requested that the VOC emission limit at the fiberglass operations be increased to 25 tons per 12 consecutive month period. Since the fiberglass facilities were constructed prior to 1980, this does not change the nonapplicability of 326 IAC 8-1-6. Also, the VOC usage at the paint operations will be limited to 70 tons per year. The potential to emit VOC from all other facilities at this source is less than 5 tons per year. Therefore, the VOC emissions from the fiberglass operations can be limited to 25 tons per year and the requirements of 326 IAC 2-7 are still not applicable.

(c) The single hazardous air pollutant (HAP) usage for the two (2) fiberglass booths, identified as S11 and S12, shall be limited such that the individual HAP emissions at the two (2) fiberglass booths plus the amount of that same HAP used by all other facilities at this source shall not exceed 9.0 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

(d) The usage of any combination of HAPs at the two (2) fiberglass booths, identified as S11 and S12, shall be limited such that the total HAPs emissions shall not exceed 10.9 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

(e) Condition D.3.2(b) from FESOP 091-5578-00056, issued on December 12, 1996, which states that the amount of any combination of HAPs delivered to the fiberglass applicators plus the amount of any combination of HAPs used for clean up shall not exceed 8 tons per 12 month period, is not applicable because the Permittee requested that the total HAP emission limit at the fiberglass operations be increased to 10.9 tons per 12 consecutive month period. Since the fiberglass facilities were constructed prior to July 27, 1997, this does not change the nonapplicability of 326 IAC 2-4.1-1. Also, the total HAP usage at the paint operations are limited to 13 tons per year. The potential to emit HAPs from all other facilities at this source is less than 1 ton per year. Therefore, the total HAP emissions from

the fiberglass operations can be limited to 10.9 tons per year and the requirements of 326 IAC 2-7, Part 70, are still not applicable.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the two (2) fiberglass booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.2.5 VOC and HAP Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound (VOC) and hazardous air pollutant (HAP) usage and emissions for the twelve (12) month period.

D.2.6 Particulate Matter (PM)

Pursuant to FESOP 091-5578-00056, issued on December 12, 1996, and in order to comply with D.2.2, the dry filters for PM control shall be in operation at all times when the two (2) fiberglass booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Monitoring

(a) Daily inspections and manometer readings shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S11 and S12, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Redundant secondary filter systems shall be installed behind each primary filter system and, at each booth, a manometer reading of the secondary redundant filter system shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.

(c) Inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground each time a maintenance employee goes onto a building rooftop, and no less than once per quarter. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps

for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(e) Condition D.3.4 of FESOP 091-5578-00056, issued on December 12, 1996, which stated that weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground and for times when the Permittee has determined it unsafe to inspect the rooftop, it is acceptable to inspect the plenum behind the dry filters to determine if overspray has occurred, is not applicable because rooftop inspections are unsafe at this source. The Permittee has requested to perform rooftop inspections each time a maintenance employee goes onto a building roof-top and no less than once per quarter. In order to ensure no overspray, The New York Blower has installed redundant secondary filter systems behind each primary filter system. Manometer readings will be performed daily on the primary filter systems and on the secondary filter systems each time there is a filter change at the primary filter system. These requirements are specified in (a) through (d) of this condition.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Condition D.2.1.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.6 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and quarterly inspections, daily manometer readings, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(e) Welding units, capacity: 0.018 tons of electrode per hour.

(f) One (1) electrostatic closed loop powder spray booth, capacity: 15.3 pounds of powder coat per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the welding operations and from the one (1) electrostatic closed loop powder spray booth shall not exceed 0.551 pounds per hour, each, when operating at a process weight rate less than 100 pounds per hour, each. The allowable PM emission rates are based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: The New York Blower Company
Source Address: 171 Factory Street, La Porte, Indiana 46350
Mailing Address: 171 Factory Street, La Porte, Indiana 46350
FESOP No.: F 091-13638-00056

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: The New York Blower Company
Source Address: 171 Factory Street, La Porte, Indiana 46350
Mailing Address: 171 Factory Street, La Porte, Indiana 46350
FESOP No.: F 091-13638-00056

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FESOP Quarterly Report

Source Name: The New York Blower Company
Source Address: 171 Factory Street, La Porte, Indiana 46350
Mailing Address: 171 Factory Street, La Porte, Indiana 46350
FESOP No.: F 091-13638-00056
Facility: Nine (9) paint booths
Parameter: VOC, individual HAP and total HAP usage
Limit: No more than 70 tons of VOC, 13 tons of any combination of HAPs and 9.0 tons of each individual HAP per consecutive twelve (12) month period

YEAR: _____

Month	VOC Usage			Total HAP Usage			Individual HAP Usage (worst case) including emissions of that HAP from all other processes		
	This Month (tons)	Twelve month total through this month (tons)	Monthly average based on 12 month total (tons)	This Month (tons)	Twelve month total through this month (tons)	Monthly average based on 12 month total (tons)	This Month (tons)	Twelve month total through this month (tons)	Monthly average based on 12 month total (tons)
January									
February									
March									
April									
May									
June									
July									
August									
September									
October									
November									
December									
Total Year to Date									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FESOP Quarterly Report

Source Name: The New York Blower Company
Source Address: 171 Factory Street, La Porte, Indiana 46350
Mailing Address: 171 Factory Street, La Porte, Indiana 46350
FESOP No.: F 091-13638-00056
Facility: Two (2) fiberglass booths
Parameter: VOC, individual HAP and total HAP emissions
Limit: No more than 25 tons of VOC, 10.9 tons of any combination of HAPs and 9.0 tons of each individual HAP per consecutive twelve (12) month period

YEAR: _____

Month	VOC Emissions			Total HAP Emissions			Individual HAP Emissions (worst case) including emissions of that HAP from all other processes		
	This Month (tons)	Twelve month total through this month (tons)	Monthly average based on 12 month total (tons)	This Month (tons)	Twelve month total through this month (tons)	Monthly average based on 12 month total (tons)	This Month (tons)	Twelve month total through this month (tons)	Monthly average based on 12 month total (tons)
January									
February									
March									
April									
May									
June									
July									
August									
September									
October									
November									
December									
Total Year to Date									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: The New York Blower Company
Source Address: 171 Factory Street, La Porte, Indiana 46350
Mailing Address: 171 Factory Street, La Porte, Indiana 46350
FESOP No.: F 091-13638-00056

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: ______________________

Form Completed By: ______________________________________

Title/Position: ______________________________________

Date: ______________________________________

Phone: ______________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)
Renewal

Source Name: **The New York Blower Company**
Source Location: **171 Factory Street, La Porte, Indiana 46350**
County: **La Porte**
SIC Code: **3564**
Operation Permit No.: **F 091-13638-00056**
Permit Reviewer: **CarrieAnn Ortolani**

On March 26, 2001, the Office of Air Quality (OAQ) had a notice published in the La Porte Herald - Argus, La Porte, Indiana, stating that The New York Blower Company had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary metal and fiberglass air moving equipment manufacturing source with dry filters as overspray controls. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

In order to clarify that this is a FESOP renewal, the following changes have been made:

The title page has been changed as follows:

FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) **RENEWAL**
OFFICE OF AIR QUALITY

Section A.5 is revised as follows:

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP) **Renewal**.

Change 2:

A typographical error in Section A.4(b) has been corrected as follows:

(b) Plant 2 - Five (5) 0.084 million British thermal unit per hour heaters, one (1) 0.28 million British thermal unit per hour heaters, two (2) 0.104 million British thermal unit per hour heaters, one (1) 0.2 million British thermal unit per hour air makeup unit, one (1) 0.3465 million British thermal unit per hour air makeup unit, one (1) 0.2475 million British thermal unit per hour air makeup unit, one (1) 0.495 million British thermal unit per hour air makeup unit, one (1) 0.66 million British thermal unit per hour air makeup unit, one (1) 2.2 million British thermal unit per hour air makeup unit and one (1) 1.0 million British thermal units per hour heater (all units natural gas fired).

Change 3:

Since this is a FESOP Renewal, all Preventive Maintenance Plans should have already been submitted. Therefore, Condition B.13 is revised as follows:

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:~~

~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~

~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~

~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

~~If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b)~~**(a)** The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

~~(c)~~**(b)** A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(d)~~**(c)** Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

Change 4:

The phone numbers and facsimile number for the Northwest Regional Office has been corrected in Condition B.14 as follows:

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was, at the time being, properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Regional Office Telephone No.: ~~1-888-672-8323 or 812-436-2570~~ **1-888-209-8892 or 1-219-881-6712**
Regional Office Facsimile No.: ~~812-436-2572~~ **1-219-881-6745**

Failure to notify IDEM, OAQ and Northwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

Change 5:

Since this is a FESOP renewal and not a new FESOP, Conditions C.11 and C.19 are revised as follows:

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented ~~within ninety (90) days of permit issuance~~. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. ~~If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management~~
~~Air Compliance Branch, Office of Air Quality~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.~~

~~The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered

timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report ~~shall cover~~ **covered** the period commencing on the date of issuance of **the original FESOP** ~~this permit~~ and ending on the last day of the reporting period. **All subsequent** reporting periods **shall be** ~~are~~ based on calendar years.

Change 6:

A typographical error in Condition D.1.2(c) was corrected as follows:

(c) The amount of any single hazardous air pollutant (HAP) delivered to the paint applicators, plus the amount of that same HAP used for clean up, plus the amount of that same HAP used by a**l**l other facilities at this source shall not exceed 9.0 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**The New York Blower Company**
Source Location:	**171 Factory Street, La Porte, Indiana 46350**
County:	**La Porte**
SIC Code:	**3564**
Operation Permit No.:	**F 091-13638-00056**
Permit Reviewer:	**CarrieAnn Ortolani**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from The New York Blower Company relating to the operation of a metal and fiberglass air moving equipment manufacturing source.

Source Definition

This metal and fiberglass air moving equipment manufacturing source consists of four (4) plants located on contiguous properties, having the same SIC codes, owned by one (1) company, and functioning as a single source. Therefore, they are considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Six (6) paint booths, identified as S1, S2, S3, S4, S7 and S8, constructed between 1974 and 1979, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stacks S1, S2, S3, S4, S7 and S8, respectively.

(b) Two (2) paint booths, identified as S5 and S6, constructed between 1974 and 1979, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.

(c) One (1) paint booth, identified as S9, constructed after 1979, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stack S9, respectively.

(d) One (1) fiberglass spray booth, identified as S11, constructed between 1974 and 1979, equipped with flow coaters and dry filters as overspray control, exhausting to stack S11.

(e) One (1) fiberglass booth for hand cleaning molds with acetone, gel coat repair application using cup guns, and graphite application, identified as S12, constructed between 1974 and 1979, equipped with dry filters as overspray control, exhausting to stack S12.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Plant 1 - Three (3) 4.95 million British thermal unit per hour Rapid Air units, one (1) 0.4 million British thermal unit per hour Reznor MUA, two (2) 0.32 million British thermal unit per hour phosphate pressure wash units and two (2) 1.0 million British thermal unit loading dock heaters (all units natural gas fired).

(b) Plant 2 - Five (5) 0.084 million British thermal unit per hour heaters, one (1) 0.28 million British thermal unit per hour heaters, two (2) 0.104 million British thermal unit per hour heaters, one (1) 0.2 million British thermal unit per hour air makeup unit, one (1) 0.3465 million British thermal unit per hour air makeup unit, one (1) 0.2475 million British thermal unit per hour air makeup unit, one (1) 0.495 million British thermal unit per hour air makeup unit, one (1) 0.66 million British thermal unit per hour air makeup unit, one (1) 2.2 million British thermal unit per hour air makeup unit and one (1) 1.0 million British thermal units per hour heater (all units natural gas fired).

(c) Plant 3 - One (1) 6.25 million British thermal unit per hour air makeup unit, one (1) 3.03 million British thermal unit per hour Rapid Air unit and one (1) 0.32 million British thermal unit per hour phosphate pressure wash unit (all units natural gas fired).

(d) Plant 4 - One (1) 5.5 million British thermal unit per hour air makeup unit, one (1) 3.3 million British thermal unit per hour air makeup unit, one (1) phosphate wash unit consisting of two (2) 2.5 million British thermal unit per hour burners, two (2) 2.4 million British thermal unit per hour dry off ovens, one (1) 0.32 million British thermal unit per hour phosphate pressure washer, and one (1) 2.4 million British thermal unit per hour curing oven system (all units natural gas fired).

(e) Welding units, capacity: 0.018 tons of electrode per hour.

(f) One (1) electrostatic closed loop powder spray booth, capacity: 15.3 pounds of powder coat per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 46-01-89-0181, issued on April 2, 1985;

(b) CP 091-2410-00056, issued on October 15, 1992;

(c) FESOP 091-5578-00056, issued on December 12, 1996; and

(d) MPR 091-10666-00056, issued on April 29, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

(a) CP 091-2410-00056, issued on October 15, 1992

Operation Condition 9: That the baked paint line will use High Volume, Low Pressure (HVLP) paint guns pursuant to the 326 IAC 8-1-5, petition for site specific reasonable available control technology (RACT) plan, as an alternative to the requirements for 326 IAC 8-2-9, VOC rules for miscellaneous metal coatings.

And

FESOP 091-5578-00056, issued on December 12, 1996

Condition D.1.1(c): Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), 326 IAC 8-1-5 (RACT) and CP 091-2410, issued on October 15, 1992, Booth S10 shall use High Volume, Low Pressure (HVLP) paint guns as an alternative to the requirements of 326 IAC 8-2-9.

Reason not incorporated:

The one (1) paint booth, Booth S10, addressed in these conditions have been removed. Stack S10 has also been removed.

(b) FESOP 091-5578-00056, issued on December 12, 1996

Condition D.1.1(d): The amount of volatile organic compounds (VOCs) delivered to the paint applicators plus used for clean-up shall not exceed 80 tons per 12 month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated:

The Permittee has requested that the potential to emit VOC from the nine (9) paint booths be limited to less than 70 tons per consecutive twelve (12) month period.

(c) FESOP 091-5578-00056, issued on December 12, 1996

And Condition D.3.2(b): The amount of any combination of HAPs delivered to the fiberglass applicators plus the amount of any combination of HAPs used for clean-up shall not exceed 8 tons per 12 month period.

Reason not incorporated:

The Permittee requested that the total HAP emission limit at the fiberglass operations be increased to 10.9 tons per 12 consecutive month period. This request results from the changes in the emission factors for fiberglass reinforced plastics operations. Since the fiberglass facilities were constructed prior to July 27, 1997, this does not change the nonapplicability of 326 IAC 2-4.1-1. Also, the total HAP usage at the paint operations are limited to 13 tons per year. The potential to emit HAPs from all other facilities at this source is less than 1 ton per year. Therefore, the total HAP emissions from the fiberglass operations can be limited to 10.9 tons per year and the requirements of 326 IAC 2-7, Part 70, are still not applicable.

(d) FESOP 091-5578-00056, issued on December 12, 1996

Condition D.3.1: The amount of volatile organic compounds (VOCs) delivered to the fiberglass applicators plus used for clean-up shall not exceed 10 tons per 12 month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated:

The Permittee requested that the VOC emission limit at the fiberglass operations be increased to 25 tons per 12 consecutive month period. This request results from the changes in the emission factors for fiberglass reinforced plastics operations. Since the fiberglass facilities were constructed prior to 1980, this does not change the nonapplicability of 326 IAC 8-1-6. Also, the VOC usage at the paint operations will be limited to 70 tons per year. The potential to emit VOC from all other facilities at this source is less than 5 tons per year. Therefore, the VOC emissions from the fiberglass operations can be limited to 25 tons per year and the requirements of 326 IAC 2-7 are still not applicable.

(e) CP 091-2410-00056, issued on October 15, 1992

Operation Condition 5: That a log of information necessary to document compliance with condition 4 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management. A quarterly summary shall be submitted the Enforcement Section within 30 days after the end of the quarter being reported in the format attached. These reports shall include a complete Method 24 analysis for coatings, the calculated pounds of solvent-used per calendar month, and the daily calculated pounds of solvent used per gallons of coatings.

Reason not incorporated:

The condition required that the Permittee show compliance of Booth S9 with 326 IAC 8-2-9 through record keeping and reporting. The Permittee has indicated that only nyb green, Carrier Gray and Hi-Heat Gray are used in Booth 9. Those three (3) coatings have VOC contents less than 3.5 pounds per gallon. Therefore, the source will still be required to keep records and Material Safety Data Sheets (MSDSs) to show compliance, but quarterly reporting will not be required as long as only coating with VOC contents less than 3.5 pounds per gallon are used.

(f) FESOP 091-5578-00056, issued on December 12, 1996

Conditions D.1.4 and D.3.4: Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To document compliance with Conditions D.1.3 and D.3.3 observations shall be made daily of the overspray while at least one of the booths is in operation. Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. For times when the Permittee has determined it unsafe to inspect the rooftop, it is acceptable to inspect the plenum behind the dry filters to determine if overspray has occurred. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or any other abnormal emission is observed. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason not incorporated:

Rooftop inspections are unsafe at this source. The Permittee has requested to perform rooftop inspections each time a maintenance employee goes onto a building rooftop and no less than once per quarter. In order to ensure no overspray, The New York Blower has installed redundant secondary filter systems behind each primary filter system. Manometer readings will be performed daily on the primary filter systems and on the secondary filter systems each time there is a filter change at the primary filter system.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on December 18, 2000. The New York Blower Company also requested changes to the FESOP that will be incorporated into this FESOP document. Additional information was received on February 7, 2001 and March 12, 2001, via telephone.

There was no notice of completeness letter was mailed to the source.

Emission Calculations

See pages 1 through 7 of 7 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE after controls since all control equipment was required in the FESOP issued on December 12, 1996. The table also reflects the PTE after all FESOP limitations.

Pollutant	**Potential To Emit** (tons/year)
PM	3.42
PM_{10}	4.80
SO_2	0.144
VOC	< 100
CO	20.2
NO_X	24.0

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Manganese	0.016
Nickel	0.167
Chromium	0.032
Benzene	0.0005
Dichlorobenzene	0.0003
Formaldehyde	0.018
Hexane	0.447
Toluene	7.51
Lead	0.0001
Cadmium	0.0003
Cumene	0.020
Ethyl benzene	0.351
Hexamethylene-Diisocyanate	0.020
MEK	0.113
MIBK	5.17
Styrene	9.0
Xylenes	9.0
Tolyl Bigunaide	0.015
Ethylene Glycol	0.150
Cobalt	0.095
N,N Dimethylanaline	0.099
Phosphorus	negligible
Antimony Compounds	0.134
TOTAL	< 25

This source, otherwise required to obtain a Title V permit, agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source was issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8. The source will continue to comply with the requirements of 326 IAC 2-8, FESOP.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable because it was required by the Federally Enforceable State Operating Permit issued on December 12, 1996.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Nine (9) paint booths	0.792	0.792	0.00	< 70	0.00	0.00	9.0 individual 13.0 total
Two (2) fiberglass booths	1.28	1.28	0.00	< 25	0.00	0.00	9.0 individual 10.9 total
Insignificant Activities	1.35	2.72	0.144	1.32	20.2	24.0	0.668
Total Emissions	3.42	4.79	0.144	< 100	20.2	24.0	Single <10 Total <25

These limitations reflect the requested changes in allocation of the limited emissions among the emission units. These changes will be made to the FESOP since they will allow the source to continue operating under the source-wide FESOP limits.

County Attainment Status

The source is located in La Porte County.

Pollutant	**Status**
PM_{10}	Attainment
SO_2	Maintenance
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. La Porte County has been designated as attainment or unclassifiable for ozone.

(b) La Porte County has been classified as maintenance for SO_2 and attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

(c) The insignificant phosphate washers do not use halogenated solvents. Therefore, the requirements of 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) are not applicable.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in La Porte County and the potentials to emit PM_{10}, CO, SO_2, NO_X and VOC are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of $PM_{10,}$ SO_2, VOC, CO and NO_X shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Since all facilities at this source were constructed prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, do not apply.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the nine (9) paint booths and two (2) fiberglass booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times when the nine (9) paint booths and two (2) fiberglass booths are in operation, in order to comply with this limit.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from welding operations shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. Since the potential to emit PM from the welding operations is 0.05 pounds per hour, the welding operations will comply with this rule.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) electrostatic closed loop powder spray booth shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. Since the potential to emit PM from the powder spray booth is 0.153 pounds per hour, the powder spray booth will comply with this rule.

326 IAC 8-1-6 (New facilities; General reduction requirements)

(a) The requirements of 326 IAC 8-1-6 are not applicable to the two (2) fiberglass booths because they were constructed prior to January 1, 1980.

(b) The requirements of 326 IAC 8-1-6 are not applicable to the eight (8) paint booths, identified as S1 through S8, because they were constructed prior to 1980.

(c) The one (1) paint booth, identified as S9, is subject to the requirements of 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) paint booth, identified as S9, constructed after 1979, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried and air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDSs submitted by the source and calculations made, the spray booth is in compliance with this requirement.

(b) The eight (8) paint booths, identified as S1 through S8, are not subject to the requirements of 326 IAC 8-2-9 because they were constructed prior to 1980 in La Porte County.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The insignificant phosphate washers do not use organic solvents. Therefore, the requirements of 326 IAC 8-3 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source commenced operation after October 7, 1974, and prior to January 1, 1980 in La Porte County, but the potential to emit VOC is less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 8-6 do not apply.

Testing Requirements

There is no testing required by this permit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The nine (9) paint booths have applicable compliance monitoring conditions as specified below:

(1) Daily inspections and manometer readings shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S1 through S9, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Redundant secondary filter systems shall be installed behind each primary filter system and, at each booth, a manometer reading of the secondary redundant filter system shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.

(3) Inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground each time a maintenance employee goes onto a building rooftop, and no less than once per quarter. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall

be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

(b) The two (2) fiberglass booths have applicable compliance monitoring conditions as specified below:

(1) Daily inspections and manometer readings shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S11 and S12, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Redundant secondary filter systems shall be installed behind each primary filter system and, at each booth, a manometer reading of the secondary redundant filter system shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.

(3) Inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground each time a maintenance employee goes onto a building rooftop, and no less than once per quarter. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Requested Changes

The applicant requested changes to the FESOP as part of this renewal. These changes would represent a Minor Permit Revision pursuant to 326 IAC 2-8-11.1 (d)(1), “Modifications that reduce the frequency of any monitoring or reporting required by a permit condition or applicable requirement.” Requested changes and reasons why these changes were or were not incorporated are as follows:

(a) The number of insignificant gas burners has been changed to make the heating system more efficient. Also, one (1) 2.4 million British thermal unit curing oven was added for the powder paint operation. All of these natural gas emission units are insignificant activities. Section A.4 (formerly A.3) of the permit has been revised accordingly.

(b) The applicant requested that the VOC limit for the nine (9) paint booths be decreased from 80 tons per consecutive twelve (12) month period to 70 tons per consecutive twelve (12) month period and the VOC limit for the two (2) fiberglass booths be increased from 10 tons per consecutive twelve (12) month period to 25 tons per consecutive twelve (12) month period. This request results from the changes in the emission factors for fiberglass reinforced plastics operations. Since the fiberglass facilities were constructed prior to 1980, this does not change the nonapplicability of 326 IAC 8-1-6. The potential to emit VOC from all other facilities at this source is less than 5 tons per year. Therefore, the requirements of 326 IAC 2-7 are still not applicable and the requested changes have been made.

(c) The applicant requested changes to the required monitoring for the nine (9) paint booths and the two (2) fiberglass booths. The applicant feels that the rooftop inspections are unsafe at this source. The applicant has requested to perform rooftop inspections each time a maintenance employee goes onto a building rooftop and no less than once per quarter. In order to ensure no overspray, The New York Blower has install redundant secondary filters systems behind each primary filter system. Manometer readings will be performed daily on the primary filters systems and on the secondary filter systems each time there is a filter change at the primary filter system.

(d) Previously, fiberglass booth S12 performed hand cleaning of molds with methylene chloride. Hand cleaning is currently performed with acetone, which is neither a VOC nor a HAP. The facility description has been revised to eliminate methylene chloride.

(e) The applicant has proposed new formats for reporting VOC and HAP emissions. These formats have been revised to indicate that the individual HAP emission limit is from the entire source. Therefore, the reporting forms proposed by the applicant are used in this FESOP.

(f) The one (1) paint booth, identified as S10, and stack S10 have been removed. All conditions pertaining only to the one (1) paint booth, identified as S10, have been removed.

Conclusion

The operation of this a metal and fiberglass air moving equipment manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 091-13638-00056.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December '

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Butyl Cellosolve	7.51	100.00%	0.0%	100.0%	0.0%	0.00%	0.00440	5.781	7.51	7.51	0.19	4.58	0.84	0.00	n/a	50%
nyb Green Emulsion	9.33	53.62%	50.5%	3.1%	79.7%	36.46%	0.35000	5.781	1.43	0.29	0.59	14.14	2.58	19.17	0.80	50%
Carrier Gray	8.70	66.60%	56.3%	10.3%	58.6%	30.60%	0.35000	5.781	2.16	0.90	1.81	43.51	7.94	12.88	2.93	50%
nyb Green	9.61	60.30%	46.9%	13.4%	54.2%	27.81%	0.35000	5.781	2.81	1.29	2.61	62.53	11.41	16.91	4.63	50%
Safety Orange	8.86	65.66%	50.3%	15.4%	56.5%	27.56%	0.35000	5.781	3.13	1.36	2.75	66.09	12.06	13.48	4.94	50%
Safety Yellow	9.10	68.78%	56.4%	12.4%	61.8%	22.61%	0.35000	5.781	2.95	1.13	2.28	54.71	9.98	12.59	4.98	50%
Hi Heat Gray	9.60	58.60%	43.1%	15.5%	49.6%	30.24%	0.35000	5.781	2.95	1.49	3.01	72.26	13.19	17.61	4.92	50%
Kem Flash Primer HS TD Gray	12.10	26.10%	0.0%	26.1%	0.0%	51.80%	0.35000	5.781	3.16	3.16	6.39	153.36	27.99	39.62	6.10	50%
Heresite	7.80	46.40%	0.0%	46.4%	0.0%	46.50%	0.35000	5.781	3.62	3.62	7.32	175.75	32.07	18.53	7.78	50%
Safety Blue Urethane	10.80	34.60%	0.0%	34.6%	0.0%	51.70%	0.35000	5.781	3.74	3.74	7.56	181.46	33.12	31.30	7.23	50%
White Urethane	10.70	34.80%	0.0%	34.8%	0.0%	51.70%	0.35000	5.781	3.72	3.72	7.53	180.82	33.00	30.91	7.20	50%
Gray Primer	9.88	42.89%	0.0%	42.9%	0.0%	36.38%	0.35000	5.781	4.24	4.24	8.57	205.78	37.55	25.00	11.65	50%
White Epoxy	11.06	39.30%	0.0%	39.3%	0.0%	39.25%	0.35000	5.781	4.35	4.35	8.79	211.07	38.52	29.75	11.07	50%
Urethane Cure Agent	9.50	7.00%	0.0%	7.0%	0.0%	99.20%	0.35000	5.781	0.67	0.67	1.35	32.29	5.89	39.15	0.67	50%
Kem Enamel TD Gray	8.34	52.70%	0.0%	52.7%	0.0%	38.40%	0.35000	5.781	4.40	4.40	8.89	213.43	38.95	17.48	11.45	50%
Fed Gray Epoxy	10.40	43.68%	0.0%	43.7%	0.0%	36.54%	0.35000	5.781	4.54	4.54	9.19	220.60	40.26	25.95	12.43	50%
Shale Gray Urethane	9.99	45.75%	0.0%	45.8%	0.0%	38.35%	0.03500	5.781	4.57	4.57	0.92	22.19	4.05	2.40	11.92	50%
Triotech Curing Agent	8.14	57.29%	0.0%	57.3%	0.0%	36.65%	0.35000	5.781	4.66	4.66	9.44	226.46	41.33	15.41	12.72	50%
Kem Enamel TD Blue	8.01	58.30%	0.0%	58.3%	0.0%	33.50%	0.35000	5.781	4.67	4.67	9.45	226.77	41.39	14.80	13.94	50%
Activator Semi-Gloss	8.43	60.18%	0.0%	60.2%	0.0%	28.77%	0.35000	5.781	5.07	5.07	10.26	246.36	44.96	14.87	17.63	50%
Green Aerosol	6.60	80.00%	0.0%	80.0%	0.0%	10.00%	0.00010	5.781	5.28	5.28	0.00	0.07	0.01	0.00	52.80	50%
Gloss Activator	7.44	79.65%	0.0%	79.7%	0.0%	18.74%	0.35000	5.781	5.93	5.93	11.99	287.77	52.52	6.71	31.62	50%
Heresite Solvent	6.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.00010	5.781	6.24	6.24	0.00	0.09	0.02	0.00	n/a	50%
Epoxy Thinner	7.13	100.00%	0.0%	100.0%	0.0%	0.00%	0.03900	5.781	7.13	7.13	1.61	38.58	7.04	0.00	n/a	50%
								PM	Control Efficiency	98.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**		**13.6**	**326**	**59.6**	**39.6**		
									Controlled					**0.792**		

Only nyb green, Carrier Gray and Hi-Heat Gray are used on the booth S9.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Reinforced Plastics and Composites

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December 18, 2000

Material (Application Method)	Density (lb/gal)	Weight % Monomer VOC	CFA Unified Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Transfer Efficiency
Resin Layup - Hetron R										
(Flow Coat)										
Styrene	10.45	28.0%	59.92	11.37	0.42	1.50	35.88	6.55	39.34	75.00%
Resin Layup - Derakane R										
(Flow Coat)										
Styrene	9.09	38.0%	86.00	9.473	0.420	1.555	37.32	6.81	24.55	75.00%
Release Agent	7.50	1.0%	0.00	0.02	0.42	0.00	0.02	0.00	0.00	100.00%
Wetting Agent	8.00	22.0%	0.00	0.08	0.42	0.06	1.46	0.27	0.00	100.00%
				Total		**3.11**	**74.69**	**13.63**	**63.90**	
				VOC Control	0%					
				PM Control	98.0%					
				Potential Before Controls				**13.6**	**63.9**	
				Potential After Controls				**13.6**	**1.28**	

Styrene Emissions (tons/yr)	**13.4**

METHODOLOGY

Potential VOC Pounds per Hour =Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor (lb/ton)*(1 ton/2000 lbs)
Potential VOC Pounds per Day =Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor(lb/ton)*(1 ton/2000 lbs)
Potential VOC Tons per Year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor(lb/ton)*(1 ton/2000lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
Total = Sum of all worst case coatings and solvents used
Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December 18, 2000

Material		Maximum Usage (lbs/yr)	Maximum Usage (tons/yr)	PTE (tons/yr)	
Paint HAPs					
Cumene		40	0.020	0.020	
Ethylbenzene		702	0.351	0.351	
Hexamethylene-Diisocyanate		40	0.020	0.020	
Hexane		28	0.014	0.014	
MEK		225	0.113	0.113	
MIBK		10346	5.173	5.173	
Styrene		28	0.014	0.014	
Toluene		15021	7.511	7.511	
Xylene		21760	10.880	10.880	
Adhesive					
Tolyl Bigunaide		30	0.015	0.015	
Coolant					
Ethylene Glycol		300	0.150	0.150	
Fiberglass Processes					
Cobalt		190	0.095	0.095	
N,N Dimethylanaline		197	0.099	0.099	
Xylenes		3790	1.895	1.895	
Styrene				13.4	Calculated on Page 2
			Total HAPs:	**39.7**	
			Total Styrene:	**13.4**	
			Total Xylenes:	**12.8**	

METHODOLOGY

HAPS emission rate (tons/yr) = Maximum Usage (lbs/yr) / 2,000 hrs/yr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December 18, 2000

All Insignificant Combustion

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
54.9	480.92

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.457	1.83	0.144	24.0	1.32	20.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
Part 70: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December 18, 2000

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.05E-04	2.89E-04	1.80E-02	4.33E-01	8.18E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.20E-04	2.65E-04	3.37E-04	9.14E-05	5.05E-04	0.454

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: PM and HAP emissions
Insignificant Powder Coating

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December 18, 2000

Powder Coating

Material	Maximum Input (lbs/hr)	Percent Recovered (%)	Maximum Usage (lbs/hr)	PTE PM (lbs/hr)	PTE PM (tons/yr)	Weight % HAP (%)	PTE HAP (tons/yr)
Powder (no VOC)	15.3	99.0%	0.153	0.153	0.670	20.0%	0.134

HAPs are contained in Yellow Coating used at this source. potentially emitted.
The weight % HAPs represents the total weight % of Nickel Antimony Titanium Yellow Rutile, which contains Antimony and Nickel.

Methodology
Maximum Usage (lbs/hr) = Maximum input (lbs/hr) - (Maximum input (lbs/hr) * (1-percent recovered))
PTE PM (lbs/hr) = Maximum Usage (lbs/hr)
PTE PM (tons/yr) = PTE PM (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton
PTE HAP (tons/yr) = PTE PM (tons/yr) * Weight % HAP

Appendix A: Welding and Thermal Cutting

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-13638
Plt ID: 091-00056
Reviewer: CarrieAnn Ortolani
Date: December 18, 2000

PROCESS	Max. electrode consumption		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING	(lbs/hr)		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	0		0.036				0.000	0	0.000	0	0.000
Metal Inert Gas (MIG)(Haynes 25)	36.5		0.0014	0.0001	0.0002	0.0002	0.051	0.004	0.007	0.007	0.018
Stick (E7018 electrode)	0		0.0211				0.000	0	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0		0.0055				0.000	0	0.000	0	0.000
Oxyacetylene(carbon steel)	0		0.0055				0.000	0	0.000	0	0.000
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.051	0.004	0.007	0.007	0.018
Potential Emissions lbs/day							1.226	0.088	0.175	0.175	0.438
Potential Emissions tons/year							**0.224**	0.016	0.032	0.032	0.080

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Emission factors for Haynes 25 provided by applicant.
Welding emissions, lb/hr: (max. lbs of electrode used/hr)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.